

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**G. MARIE NEWBY, Individually, and)
as Administratrix of THE ESTATE OF)
TERRY CHILDRESS,)**

Plaintiffs,)

v.)

**CORECIVIC OF TENNESSEE, LLC,)
as Owner and Operator of TROUSDALE)
TURNER CORRECTIONAL CENTER,)
DAMON HININGER, STEVE CONRY,)
RAYMOND BYRD, and SHAWNA)
CURTIS,)**

Defendants.)

**Civil Action Number 3:22-CV-93
Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Jeffery S. Frensley
Jury Demand**

DECLARATION OF SHAWNA CURTIS

I, Shawna Curtis, pursuant to 28 U.S.C. § 1746, state as follows:

1. I am over eighteen years of age, and I am competent to testify to the matters set forth in this declaration. I make this declaration based on personal knowledge and/or knowledge reasonably made available to me.

2. I am a former employee of CoreCivic of Tennessee, LLC (“CoreCivic”), and I specifically was employed by the company from January 14, 2019, through March 17, 2020. I served as a correctional officer and then as a case manager at the Trousedale Turner Correctional Center (“Trousedale”) during this timeframe.

3. I was not employed by CoreCivic on December 8, 2020, I did not work at Trousedale on December 8, 2020, and I did not classify Tymothy Willis (“Willis”) on December 8, 2020.

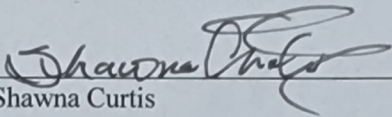
4. I understand that my name appears on a Classification Custody Assessment Form (“Custody Form”) for Willis that is dated December 8, 2020. My name does appear on the Custody Form, but the appearance of my name is a clerical error of unknown origin. I could not have completed the Custody Form. I was not employed by CoreCivic on December 8, 2020, I did not work at Trousdale on December 8, 2020, and I did not classify Willis on December 8, 2020. My employment records reflect as much as does my own awareness of my employment history.

5. A true and correct copy of my Separation Notice from CoreCivic is attached hereto as Exhibit A.

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I declare under the penalty of perjury that the foregoing is true and correct.

Executed on: 07.16.2022


Shawna Curtis

Respectfully submitted,

/s/ Joseph F. Welborn, III

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Tennessee, LLC, Damon Hininger, Steven
Conry, Raymond Byrd, and Shawna Curtis*

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing has been served upon Filing Users via the electronic filing system and on other counsel via U. S. Mail, first-class postage prepaid, this July 19, 2022, on the following:

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/s/ Joseph F. Welborn, III